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against intentional disturbance when the disturbance, in the eyes of the law, is for a purpose which public policy does not sanction. The law's traditional bias in favor of competition has led the courts to accord traders and manufacturers complete competitive license, and injury sustained from such competition is not actionable merely because it was intentionally inflicted. *Mogul Steamship Co.* v. *McGregor*, [1892] A. C. 25. But see TRADE COMMISSION ACT, FED. STAT. ANN., SUPP. 1915 60, 62. As to workingmen, a group of jurisdictions of which Massachusetts is the leader have conceived that public policy calls for a different view. Workingmen may strike to obtain better wages or working conditions from their own employers. *Minasian* v. *Osborne*, 210 Mass. 250, 96 N. E. 1036. See *L. D. Willcutt & Sons Co.* v. *Driscoll*, 200 Mass. 110, 113, 85 N. E. 897, 899. They may strike to get work away from other workingmen. *Pickett* v. *Walsh*, 192 Mass. 572, 78 N. E. 753. But they may not strike to strengthen the union in its struggle with employers. *Folsom* v. *Lewis*, 208 Mass. 336, 94 N. E. 316. The competitive self-interest which justifies coercive trade-union activity must, it is said, be an immediate, individual self-interest. *Berry* v. *Donovan*, 188 Mass. 353, 74 N. E. 603. The broader self-interest of which the union is a manifestation is considered too remote. And the social interest in trade unionism is disregarded. The principal case is therefore not an innovation. *Lucke* v. *Clothing Cutters & Trimmers Assembly*, 77 Md. 396, 26 Atl. 505; *Erdman* v. *Mitchell*, 207 Pa. St. 79, 56 Atl. 327. *Contra*, *National Protective Ass'n* v. *Cumming*, 170 N. Y. 315, 63 N. E. 389; *Kemp* v. *Division No. 241*, 255 Ill. 213, 99 N. E. 389. Yet the shift of emphasis in modern jurisprudence from individual to social interests has gone far toward shaking the foundation on which the Massachusetts cases rest. See 14 HARV. L. REV. 219; 26 HARV. L. REV. 259. And see dissenting opinions by Mr. Justice Holmes in *Plant* v. *Woods*, 176 Mass. 492, 504, 57 N. E. 1011, 1015, and in *Coppage* v. *Kansas*, 236 U. S. 1, 27.

TORTS — UNUSUAL CASES OF TORT LIABILITY — SUIT BY WIFE FOR CAUSING IMPRISONMENT OF HUSBAND. — The defendant, in order to satisfy his dislike of the plaintiff's husband, encouraged him to commit adultery, and then procured his arrest and conviction. The plaintiff sues for loss of her husband's society and support caused by the imprisonment. *Held*, that she cannot recover. *Nieberg* v. *Cohen*, 92 Atl. 214 (Vt.).

For a discussion of this case, see NOTES, p. 511.

TRUSTS — *CESTUI'S* INTEREST IN THE *RES* — NATURE OF *CESTUI'S* INTEREST. The trustee and *cestui que trust* of a certain trust fund were citizens of New York. The *cestui* assigned his interest to the plaintiff, a citizen of Pennsylvania, who brought suit against the trustee in a federal District Court. Section 24 of the federal Judicial Code provides that the District Courts shall not have jurisdiction of "any suit to recover upon any promissory note *or other chose in action* in favor of any assignee . . . unless such suit might have been prosecuted in such court . . . if no assignment had been made." The District Court dismissed the bill for want of jurisdiction. *Held*, that the decree be reversed, partly on the ground that the *cestui's* right under a trust was a property right and not a "*chose in action*" within § 24. *Brown* v. *Fletcher*, 235 U. S. 589, 35 Sup. Ct. 154.

For a discussion of the nature of the *cestui's* interest in the trust *res*, see NOTES, p. 507.

TRUSTS — CREATION AND VALIDITY — DIRECTION TO TRUSTEE TO EMPLOY A PARTICULAR PERSON AS ATTORNEY IN ADMINISTERING THE TRUST. — A testator directed in his will that the executors of his estate should employ